

Hi Kurt,

I continue trying to find out why BLM is persisting with the Panther Creek watershed geothermal leasing.

I have just reviewed a Battle Mountain Oil and Gas EA.

BLM in NV sometimes is exercising discretion to some degree in which areas to lease for Oil and Gas, due to sage-grouse concerns.

See: [https://www.blm.gov/epl-front-office/projects/nepa/38465/46761/50621/2014\\_BMDO\\_OG\\_EA\\_02.11.2014\\_508.pdf](https://www.blm.gov/epl-front-office/projects/nepa/38465/46761/50621/2014_BMDO_OG_EA_02.11.2014_508.pdf)

In the process of preparing a lease sale, the NSO sends a list of nominated parcels to each field office where the parcels are located.

Through an environmental assessment, the Field Office staff then reviews the parcels to determine:

If they are in areas open to leasing; (we have requested BLM work to get the lands withdrawn and/or the Forest conduct a LUP amendment)

If new information has become available which might change any analysis conducted during the planning process; new information - there is an immense body of new information and matters ranging from aquatic habitat concerns to climate change stresses on central Idaho aquatic and terrestrial systems, rare species, herbicide effects, etc. - that were never touched on to any real degree in the PEIS and the SCNF Plan.

Plus there is a raft of information the Forest itself must gather in order not to violate its Plan. For example, is the Forest currently meeting Plan standards for cobble embeddedness and other aquatic habitat components in all streams affected by in any way by runoff from activities related to this proposal?

If appropriate consultations have been conducted; They certainly have not. The Forest has never finished the Settlement required consultation. Plus, we believe in this situation - perched above the WSR and the Panther Creek and its Beaver Creek trib., in ESA-listed species watersheds, the full honest foreseeable impacts - including with potential leasing of other areas under the RFFD scenario - must be understood based on aquifer studies, and potential irreversible damage to aquifers from explo and development/operation phases.

What appropriate stipulations should be included; The stipulations are minimal and nearly every one can be waived. What happens if every possible waiver occurs? This demonstrates the extraordinary uncertainty.

and

If there are special resource conditions of which potential bidders should be made aware of. We have been detailing these special resource considerations - ESA species, impaired water, rare terrestrial carnivores, Wilderness values, WSR values, cumulative effects - from grazing in the Williams-Napias allotment upstream on Panther Creek to toxic mine material to increased use of harmful herbicides.

Can Idaho BLM do the same thing for geothermal parcels as NV is now doing in some areas with Oil and Gas? If so, WWP requests that BLM exercise this discretion, and withdraw your request to the Forest to lease lands in Panther Creek for industrial geothermal development.

This is a very important watershed, with many troubles already - where, I might add - the Forest Service has not yet even finalized a long-delayed Panther Creek ESA Consultation process stemming from litigation that was settled a decade or more ago. WWP v. Matejko, I believe it was.

I again stress that BLM cannot rely on the severely deficient Geothermal PEIS as a basis for this action in 2014. I also believe this would set a precedent for destruction of many other highly scenic recreational areas in

central Idaho, nearly all of which also have serious ESA bull trout, salmon/steelhead, wolverine, and many other conflicts including world-wide recognition of recreational hot springs. All of these adverse effects must be fully examined.

Thank you,

Katie Fite  
Western Watersheds Project